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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10 **IN RE: UBER TECHNOLOGIES, INC.,**
11 **PASSENGER SEXUAL ASSAULT**
12 **LITIGATION**

No. 3:23-md-03084-CRB

DECLARATION OF BRET STANLEY
SUPPORTING BRET STANLEY'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF RESPONSE
TO MOTION FOR SANCTIONS

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15 This Document Relates to:
16 All Cases
17

Judge: Honorable Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Bret Stanley, declare:

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3 1. I am a Senior Counsel at the law firm of Johnson Law Group, LLP. I am a named member
4 of the Plaintiffs' Steering Committee of MDL 3084, IN RE: UBER TECHNOLOGIES, INC.,
5 PASSENGER SEXUAL ASSAULT LITIGATION. I am a member in good standing of the Bar
6 of the State of Texas am admitted to practice before this Court. I know the following facts to be
7 true of my own knowledge, except those matters stated to be based on information and belief. If
8 called upon to testify, I could and would testify competently to the truth of the matters stated
9 herein. I respectfully submit this declaration in support of Bret Stanley's Response to Defendants'
10 Motion for Sanctions Against Bret Stanley. I have reviewed Uber's Motion for Sanctions Against
11 Bret Stanley, all exhibits attached thereto. (ECF 4604) Additionally, I have reviewed Uber's
12 Administrative Motion to Seal Uber's Motion for Sanctions against Bret Stanley. (ECF 4603).

14 2. Uber sought to have certain elements of their Motion for Sanctions Against Bret Stanley
15 sealed from the public record, including information concerning term of art associated to the
16 acronym "VFB", VFB Audit Documents, and the UUID of Joshua Aldana in a prior
17 Administrative Motion to Seal. *See* ECF 4603.

19 3. The current publicly facing documents relating to Uber's Motion for Sanctions remain
20 sealed concerning term of art associated to the acronym "VFB", VFB Audit Documents, and the
21 UUID of Joshua Aldana.

22 4. Out of abundance of caution, I am filing the Response to Uber's Motion for Sanctions
23 Against Bret Stanley with redactions applied to term of art associated to the acronym "VFB,"
24 VFB Audit Documents, and the UUID of Joshua Aldana. These redactions can be found on pages
25 in yellow highlights throughout the documents filed under seal.

27 5. The Declaration in Support of Bret Stanley's Response to Uber's Motion for Sanctions
28 likewise contains term of art associated to the acronym "VFB", reference to the VFB Audit

Documents, and the UUID of Joshua Aldana that is subject to Uber's Administrative Motion to Seal Portions of Uber's Motion for Sanctions.

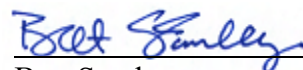
6. Out of abundance of caution, I am filing Bret Stanley's Declaration in Support of Bret Stanley's Response to Uber's Motion for Sanctions with redactions term of art associated to the acronym "VFB", VFB Audit Documents, and the UUID of Joshua Aldana because these are subject to Uber's pending Administrative Motion to Seal Portions of Uber's Motion for Sanctions. Redactions to Bret Stanley's Declaration in Support of Bret Stanley's Response to Uber's Motion for Sanctions can be found in yellow highlights throughout Exhibit A, Stanley Declaration.

7. Exhibits 1-5 Likewise have references to the term of art associated to the acronym "VFB", VFB Audit Documents, and the UUID of Joshua Aldana. This language has been sought by Uber to be sealed. Redactions to Exhibits 1-6 of Bret Stanley's Response to Uber's Motion for Sanctions against Bret Stanley are found in Yellow Highlights throughout these documents filed under seal.

8. The limited redactions sought above are requested based on pending the Administrative Motions to Seal or based on prior Court Orders. At this point, there are no less restrictive alternatives to sealing these documents.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 22nd day of December, 2025 in Houston, Texas.


Bret Stanley